

Exhibit B

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

MICHAEL VAUGHAN,

Plaintiff,

v.

Civil Action File No: 23-C-08417-S1

IMPLUS FOOTCARE, LLC

Defendant.

NOTICE OF FILING NOTICE OF REMOVAL

TO: Clerk, State Court of Gwinnett County, Georgia

COMES NOW Implus Footcare, LLC, appearing specially and without submitting to the jurisdiction or venue of this Court, and provides the following notice to the Court:

In compliance with 28 U.S.C. § 1446(d), you are hereby notified of the filing of a Notice of Removal in this action with the United States District Court for the Northern District of Georgia, Atlanta Division. A copy of the Notice of Removal is attached hereto.

Respectfully submitted this 15th day of December, 2023.

DREW ECKL & FARNHAM, LLP

/s/ Barbara A. Marschalk

Barbara A. Marschalk

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L. Mitchell Puckett

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CERTIFICATE OF SERVICE

I hereby certify that I am counsel for Defendant Implus Footcare, LLC and that I have served all interested parties with a copy of the foregoing *Notice of Filing Notice of Removal* upon counsel for all parties by filing with Odyssey File and Serve, which will automatically deliver electronic notification to the following counsel of record:

William Maxwell Compton, Esq.
Harris Yegelwel, Esq.
Morgan & Morgan
200 Stephenson Ave., Suite 200
Savannah, Georgia 31405

This 15th day of December, 2023.

DREW ECKL & FARNHAM, LLP

/s/ Barbara A. Marschalk

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